

OSHA's Proposed Rule on ETS

P. 2: Can we argue that all ETS constituents regulated by OSHA do not exceed the respective PELs?

P. 6: ... the small pollutant loads from smoking at the levels which we observe, without necessarily exposure nonsmokers to significantly elevated levels ...

Can this be qualified?

P. 7: ... all indicators for ETS are at extremely low, de minimis levels ...

... that exposure to ETS will be de minimis.

Quantify!

P. 7: ... return and outside air will be filtered prior to returning to the supply system.

Filtering of return air seems unusual

2BR?

P. 10: ... all concentrations of UVPM and formaldehyde were low

Relative to what?

P. 12: The data indicate little nonsmoker exposure ...

Quantify,!

P. 11: Three cigarettes per year in ...

(as Tom (ham))

Can we argue that this view is shared by epidemiologists who set the smoker/nonsmoker threshold at 100 cig. in a lifetime?

P. 14: resulted in substantial reductions of exposure ...

Can It should be shown that a ban is not significantly more effective?

P. 14: ... a level consistent with these ... with smokers.

Why ^{would it} be ^{be} this agreement relevant?

P. 18: ... and nonsmoker exposure to ETS constituents was greater than in buildings (1) and (2)

How much? Significantly?

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P. 18: *Nicotine was below the level of detection ...*

There is no general level of detection.

Here we argue as if nicotine were a quantitative marker for (ETS)?

P. 20: *removes ETS constituent levels ... below levels of detection or quantitation*

Detection levels are not toxicologically relevant. Do level fall below PELs?

P. 25: *increase in outside air ventilation will incur costs in the redesign*

It will increase energy costs / significant by!

"Irritation" defined

Sett

P. 8: *contribution from ETS ... of ten indistinguishable from background levels.*

except for its odor!

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